

LEWIS BRISBOIS BISGAARD & SMITH LLP

H. PAUL EFSTRATIS, SB# 242373

E-Mail: Paul.Efstratis@lewisbrisbois.com

TAYLOR F. SULLIVAN, SB# 297014

E-Mail: Taylor.Sullivan@lewisbrisbois.com

333 Bush Street, Suite 1100

San Francisco, California 94104-2872

Telephone: 415.362.2580

Facsimile: 415.434.0882

Attorneys for Defendant FORD MOTOR
COMPANY

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

TONY CLARK and PAMELA
ELY,

Plaintiffs,

vs.

FORD MOTOR COMPANY, a
Delaware Corporation; and DOES 1
through 10, inclusive,

Defendant.

Case No. 2:22-cv-03069-SVW-GJS

**DECLARATION OF TAYLOR F.
SULLIVAN IN SUPPORT OF
DEFENDANT FORD MOTOR
COMPANY'S OPPOSITION TO
PLAINTIFFS' MOTION FOR
REMAND TO SUPERIOR COURT
OF CALIFORNIA**

[Filed concurrently with Opposition to
Plaintiffs' Motion to Remand to State
Court]

Date: July 11, 2022

Time: 1:30p.m.

Courtroom: 10A

Action Filed: April 1, 2022

Trial Date: Not Set

DECLARATION OF TAYLOR F. SULLIVAN

I, Taylor F. Sullivan, declare as follows:

1. I am an attorney duly admitted to practice in all of the courts of the State of California and I am an associate with Lewis Brisbois Bisgaard & Smith LLP, attorneys of record for DEFENDANT FORD MOTOR COMPANY herein. The facts set forth herein are of my own personal knowledge, and if sworn I could and would

1 competently testify thereto.

2 2. Plaintiffs served their Complaint on Ford on April 6, 2022.

3 3. The Manufacturer's Vehicle Invoice for the subject vehicle indicates the
4 original suggested retail price is \$48,695.00 Attached as **Exhibit 1** is a true and correct
5 copy of the invoice for the Subject Vehicle.

6 4. Attached hereto as **Exhibit 2** is the Standard Claims List available from
7 Ford's Analytical Warranty System.

8 5. I performed the calculations to determine the potential damages to be
9 awarded to Plaintiffs if they prevailed on their Song-Beverly Act claims. Pursuant to
10 the statutory method of calculation above, I calculated Plaintiffs' potential damages
11 on their Song-Beverly claims using figures presented in the Subject Vehicle's
12 Manufacturer's Invoice detailing the suggested retail price.

13 6. Ford is aware that the subject vehicle was presented for its first warranty
14 repair by Plaintiffs at 530 miles. If the trier of fact were to calculate the mileage offset
15 based on 530 miles, based on the suggested price from the Manufacturer's Vehicle
16 Invoice, the mileage off-set would be \$215.06 resulting in a buyback amount of
17 \$48,479.94 plus a potential civil penalty of no more than \$96,959.88 for a total
18 amount in controversy of \$145,439.82.

19 7. Attached hereto as **Exhibit 3** is a true and correct copy of the verdict
20 form in *Zomorodian v BMW of North America, LLC*, No. CV 17-5061-DMG.

21 8. Attached hereto as **Exhibit 4** is a true and correct copy of the verdict
22 form in *Aspinall v. Kia Motors America, Inc*, San Diego County Sup. Ct., No. 37-
23 2015-00002577-CU-BC-CTL.

24 9. Attached hereto as **Exhibit 5** is a true and correct copy of the verdict
25 form in *Harris v. Hyundai Motor America*, San Diego County Sup. Ct., No. 37-2015-
26 00019958-CU-BC-CTL.

27 10. Attached hereto as **Exhibit 6** is a true and correct copy of the verdict
28 form in *Johnson v Hyundai Motor America*, Los Angeles County Sup. Ct., No.

1 BC616616.

2 I declare under penalty of perjury under the laws of the United States of
3 America that the foregoing is true and correct and that this declaration was executed
4 on this 16th day of June, 2022, at San Rafael, California.

5
6 /s/ Taylor F. Sullivan
7 Taylor F. Sullivan
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT 1

DEALER 71E 064

VIN 1FT8W3DN8LEC62381

	Suggested Retail Price	Invoice Amount
F35Z 4X4 CREW CAB PU DRW/176	43305.00	41140.00
2020 MODEL YEAR		
J7 MAGNETIC		
1S MEDIUM EARTH GRAY CLOTH		
PREFERRED EQUIPMENT PKG.620A		
.XL TRIM		
572 .AIR CONDITIONING -- CFC FREE	NC	NC
.AM/FM STEREO MP3/CLK		
99N 7.3L DECVT NA PFI V8 ENGINE	1705.00	1551.00
44G 10-SPEED AUTOMATIC	NC	NC
TD8 .LT245/75R17E BSW ALL-SEASON		
X3L 3.73 RATIO LIMITED SLIP AXLE	NC	NC
90L POWER EQUIPMENT GROUP	1125.00	1024.00
JOB #1 ORDER		
TRAILER TOWING PACKAGE		
17F XL DECOR PACKAGE	NC	NC
14000# GVWR PACKAGE		
425 50 STATE EMISSIONS	NC	NC
43B BACKGLASS DEFROST	60.00	55.00
512 SPARE TIRE AND WHEEL	NC	NC
TELESCPNG TT MIRR-POWR/HTD		
59H CENTER HIGH MOUNT STOP LAMP	NC	NC
JACK		
66S UPFITTER SWITCHES	165.00	150.00
1 CLOTH 40/20/40 SEAT	315.00	286.00
924 PRIVACY GLASS	30.00	27.00
96V XL VALUE PACKAGE	395.00	360.00
.CRUISE CONTROL		
TOTAL OPTIONS/OTHER	3795.00	3453.00
TOTAL VEHICLE & OPTIONS/OTHER	47100.00	44593.00
DESTINATION & DELIVERY	1595.00	1595.00
 TOTAL FOR VEHICLE	 48695.00	
FUEL CHARGE		123.36
MDA ASSESSMENT		15.00
SHIPPING WEIGHT 7093 LBS.		
TOTAL	48695.00	46326.36

Exhibit 2

Server: **AWS Prod**Claims loaded through: **7-APR-2022****STANDARD CLAIMS LIST****AWS Online Report***Run Date: April 8, 2022**Note: All Costs are in US Dollars*

VIN	AWS	WERS	MKT	BODY	VER	DRIVE	PLANT	TRANS	ENG	PROD	WARR	SELLING	SELL	TIS	WCC	PREF	BASE	SUFF	VERT	FUNCTION	VFG	CCC	CD
VL	VL	VL	DER	CAB	SERIES	TYPE	CD	CD	COD	DATE	DATE	DEALER	CNT										
1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	1	5K07	FR3Z	1A189	A		FC	V17	A40	42

AWS Claim Key: 473848 **Doc #:** 097231C **FCC Auth:** 1 **Trx Code:** 1 **Labor Hrs:** .7 **Labor Cost:** 77.43 **Material Cost:** 64.39 **Total Cost:** 141.82

Dir Cd-Sub Cd: 06795 - * **Name:** FORD OF WEST COVINA **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 23-MAR-2020 **RL Cmpl Date:** 31-MAR-2020 **DIST(Mile):** 530

Cust Comments: CUSTOMER STATES TIRE PRESSURE LIGHT IS ON PLEASECHECK AND ADVISE

Tech Comments: CUST STATES TIRE LIGHT ON VERFIED CONCERN SET ALL TIRES TO FACTORY SPECS RESET TPMS SYSTEM AND SENSORS FOUND PASSENGER FRONT TIRE SENSOR READING 5 POUNDS OF REMOVED AND REPLACED RETRAINED TPMS SYSTEM EVERYTHING OK AT THIS TIME

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	15	5S11	LC3Z	9B325	A		F4	V25	E33	42
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	------	-------	---	--	----	-----	-----	----

AWS Claim Key: 4487839 **Doc #:** 206493B **FCC Auth:** 1 **Trx Code:** S07 **Labor Hrs:** .7 **Labor Cost:** 77.42 **Material Cost:** 43.12 **Total Cost:** 120.54

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 03-JUN-2021 **RL Cmpl Date:** 09-JUN-2021 **DIST(Mile):** 26831

Cust Comments: CUSTOMER STATES CHECK ENGINE LIGHT IS ON. C/S VEHICLE SEEMS TO HESITATE TO ACCELERATE UPHILLS. PLEASE CHECK AND ADVISE

Tech Comments: Performed Gasoline Engine Diagnostics KOEO Check Test P0496 Followin Pinpoint Test HX found EVAP Valve inoperative. Replaced EVAP valve Retest ok.

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*		F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	--	----	-----	-----	----

AWS Claim Key: 4802898 **Doc #:** 206732E **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 12.63

Dir Cd-Sub Cd: 00441 - * Name: PERFORMANCE FORD Ph: 626-7093558 St: CA Ctry Cd: USA Reg Cd: NA Repr Date: 18-JUN-2021 RL Cmpl Date: 07-JUL-2021 DIST(Mile): 27216

Cust Comments: RENTAL CAR GCCT CASE 32384750-J0L4R0

Tech
Comments: MSPA882181

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 4802934 Doc #: 206732D FCC Auth: B Trx Code: P11 Labor Hrs: 0 Labor Cost: 0 Material Cost: 0 Total Cost: 350

Dir Cd-Sub Cd: 00441 - * Name: PERFORMANCE FORD Ph: 626-7093558 St: CA Ctry Cd: USA Reg Cd: NA Repr Date: 18-JUN-2021 RL Cmpl Date: 07-JUL-2021 DIST(Mile): 27216

Cust Comments: RENTAL CAR GCCT CASE 32384505-X4L5W6

Tech
Comments: 10 DAYS AT 35 PER DAY MSPA882094

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	5S11	LC3Z	9D683	B	F4	V25	E33	42
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	------	-------	---	----	-----	-----	----

AWS Claim Key: 4802999 Doc #: 206732A FCC Auth: 1 Trx Code: S07 Labor Hrs: 0 Labor Cost: 0 Material Cost: 0 Total Cost: 0

Dir Cd-Sub Cd: 00441 - * Name: PERFORMANCE FORD Ph: 626-7093558 St: CA Ctry Cd: USA Reg Cd: NA Repr Date: 18-JUN-2021 RL Cmpl Date: 18-JUN-2021 DIST(Mile): 27216

Cust Comments: CHECK ENGINE LIGHT IS ON AGAIN, CHECK AND ADVISE SEE RO 206493

Tech
Comments: PERFORMED GASOLINE ENGINE DIAGNOSTICS KOEO CHECK TEST P0451 EVA SYSTEM PRESSURE SENSOR.
1.90 PERFORMED DIAGNOSTICS FOLLOWING PINPOINT TEST HX TO HX 24 FOUND INOPERATIVE FUEL TANK
PRESSURE SENSOR . CLEARED CODES, ROAD TEST OK.

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 4803161 Doc #: 206732C FCC Auth: B Trx Code: P11 Labor Hrs: 0 Labor Cost: 0 Material Cost: 0 Total Cost: 350

Dir Cd-Sub Cd: 00441 - * Name: PERFORMANCE FORD Ph: 626-7093558 St: CA Ctry Cd: USA Reg Cd: NA Repr Date: 18-JUN-2021 RL Cmpl Date: 07-JUL-2021 DIST(Mile): 27216

Cust Comments: RENTAL VEHICLE GCCT CASE #32212474-W5R8K1

Tech
Comments: 10 DAYS AT 35 PER DAY MSPA881992

1FT8W3DN8LEC62381 F7 T/FE F T/BC T/CD T/E A1 T/GG T/J0 13-JAN-2020 22-MAR-2020 171064 USA 16 6Y20 * RENTAL * F9 V99 A99 82

AWS Claim Key: 5787078 **Doc #:** 207128H **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 450

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... RENTAL CAR.... ENTERPRISE TRUCK RENTAL. GLENDORA 626-857-0988 STARTING 7-30-21... CAS-32923132-V8Z5T8' 10 DAYS AT 45 PER DAY... AUTH# MSPA352027

Tech Comments: ENTERPRISE TRUCK RENTAL 10 DAYS AT 45 PER DAY FOR 450 AUTH# MSPA352027

1FT8W3DN8LEC62381 F7 T/FE F T/BC T/CD T/E A1 T/GG T/J0 13-JAN-2020 22-MAR-2020 171064 USA 16 6Y20 * RENTAL * F9 V99 A99 82

AWS Claim Key: 5787081 **Doc #:** 207128M **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 267.6

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... ENTERPRISE RENTAL VEHICLE... 10 DAYS AT 45 PER DAY... AUTH#AUTH# MSPA354908

Tech Comments: ENTERPRISE RENTAL VEHICLE. 10 DAYS AT 45 PER DAY FOR 267.60 AUTH# MSPA354908

1FT8W3DN8LEC62381 F7 T/FE F T/BC T/CD T/E A1 T/GG T/J0 13-JAN-2020 22-MAR-2020 171064 USA 16 6Y20 * RENTAL * F9 V99 A99 82

AWS Claim Key: 5787097 **Doc #:** 207128L **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 450

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... RENTAL CAR... RENTAL CAR.... ENTERPRISE TRUCK RENTAL. GLENDORA 626-857-0988 STARTING 7-30-21.... AUTH#MSPA354737

Tech Comments: ENTERPRISE RENTAL VEHICLE. 10 DAYS AT 45 PER DAY FOR 450 AUTH#MSPA354737

1FT8W3DN8LEC62381 F7 T/FE F T/BC T/CD T/E A1 T/GG T/J0 13-JAN-2020 22-MAR-2020 171064 USA 16 6Y20 * RENTAL * F9 V99 A99 82

AWS Claim Key: 5787177 **Doc #:** 207128I **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 765

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... RENTAL CAR.... ENTERPRISE TRUCK RENTAL. GLENDORA 626-857-0988 STARTING 7-30-21.... CAS-32923176-Y4D6X0... 17 DAYS AT 45 PER DAY... AUTH# MSPA352124

Tech Comments: ENTERPRISE TRUCK RENTAL. 17 DAYS AT 45 PER DAY FOR 765 AUTH# MSPA352124

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 5787220 **Doc #:** 207128J **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 765

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR....RENTAL CAR... RENTAL CAR.... ENTERPRISE TRUCK RENTAL. GLENDORA 626-857-0988 STARTING 7-30-21... CAS-32923416-L8S3J8... 17 DAYS AT 45 PER DAY... AUTH# MSPA352201

Tech Comments: ENTERPRISE TRUCK RENTAL... 17 DAYS AT 45 PER DAY FOR AUTH# MSPA352201

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	5S11	LC3Z	9D683	B	F4	V25	E33	42
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	------	-------	---	----	-----	-----	----

AWS Claim Key: 5787222 **Doc #:** 207128B **FCC Auth:** 1 **Trx Code:** S07 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 0

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 26-AUG-2021 **DIST(Mile):** 27646

Cust Comments: CUSTOMER STATES CHECK ENGINE LIGHT IS ON. VEHICLE PREVIOUSLY IN ON RO 206732 TECH 50019 FOR SIMILAR CONCERN. PLEASE CHECK AND ADVISE

Tech Comments: PERFORMED GASOLINE ENGINE DIAGNOSTICS KOEO CHECK TEST P0451 EVAP SYSTEM PRESSURE SENSOR. 1.90 PERFORMED DIAGNOSTICS PINPOINT TEST HX TO HX 24. FOUND INOPERATIVE FUEL TANK PRESSURE SENSOR. CLEARED CODES, ROADTEST ALL OK AT THIS TIME.

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 5787223 **Doc #:** 207128C **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 350

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: HERTZ RENTAL VEHICLE.... CAS-32602148-Q0X0W0.....10 DAYS AT 35 PER DAY... AUTH# MSPA676277

Tech Comments: HERTZ RENTAL VEHICLE. 10 DAYS AT 35 PER DAY. FOR \$350 AUTH# MSPA676277

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 5787293 **Doc #:** 207128G **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 375.95

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... HERTZ RENTAL VEHICLE... CAS-32923012-W9Z3G5... 17 DAYS AT 35 PER DAY... AUTH#MSPA677102

Tech Comments: HERTZ RENTAL VEHICLE. 17 DAYS AT 35 PER DAY FOR \$375.95 AUTH#MSPA677102

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 5787304 **Doc #:** 207128F **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 350

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR..... HERTZ RENTAL VEHICLE... CAS-32602429-L4S4C6... 10 DAYS AT 35 PER DAY....AUTH# MSPA676410

Tech Comments: HERTZ RENTAL VEHICLE. 10 DAYS AT 35 PER DAY FOR \$350 AUTH# MSPA676410

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	16	6Y20	*	RENTAL	*	F9	V99	A99	82
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	---	--------	---	----	-----	-----	----

AWS Claim Key: 5787315 **Doc #:** 207128K **FCC Auth:** B **Trx Code:** P11 **Labor Hrs:** 0 **Labor Cost:** 0 **Material Cost:** 0 **Total Cost:** 765

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 12-JUL-2021 **RL Cmpl Date:** 29-SEP-2021 **DIST(Mile):** 27646

Cust Comments: RENTAL CAR... RENTAL CAR... RENTAL CAR.... ENTERPRISE TRUCK RENTAL. GLENDORA 626-857-0988 STARTING 7-30-21... CAS-32923446-R7H8K1... 17 DAYS AT 45 PER DAY... AUTH# MSPA352286

Tech Comments: ENTERPRISE TRUCK RENTAL 17 DAYS AT 45 PER DAY FOR \$765 AUTH# MSPA352286

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	18	*	*	*	*	F9	*	*
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	---	---	---	---	----	---	---

AWS Claim Key: 5544159 **Doc #:** 208001C **FCC Auth:** O **Trx Code:** 20C19 **Labor Hrs:** .4 **Labor Cost:** 56 **Material Cost:** 93 **Total Cost:** 149

Dir Cd-Sub Cd: 00441 - * **Name:** PERFORMANCE FORD **Ph:** 626-7093558 **St:** CA **Ctry Cd:** USA **Reg Cd:** NA **Repr Date:** 24-AUG-2021 **RL Cmpl Date:** 22-SEP-2021 **DIST(Mile):** 27670

Cust Comments: PERFORM FSA 20C19 FOR REAR VIEW CAMERA IMPROPER FUNCTION. CHECK AND ADVISE

Tech Comments: replaced camera and program as needed, retest ok

1FT8W3DN8LEC62381	F7	T/FE	F	T/BC	T/CD	T/E	A1	T/GG	T/J0	13-JAN-2020	22-MAR-2020	171064	USA	18	2E06	LC3Z	9H307	K	F4	V25	E33	42
-------------------	----	------	---	------	------	-----	----	------	------	-------------	-------------	--------	-----	----	------	------	-------	---	----	-----	-----	----

AWS Claim Key:	5546900	Doc #: 208001B	FCC Auth: 1	Trx Code: S07	Labor Hrs: 2.2	Labor Cost: 308	Material Cost: 275.87	Total Cost: 583.87
-----------------------	---------	-----------------------	--------------------	----------------------	-----------------------	------------------------	------------------------------	---------------------------

Dir Cd-Sub Cd:	00441 - *	Name: PERFORMANCE FORD	Ph: 626-7093558	St: CA	Ctry Cd: USA	Reg Cd: NA	Repr Date: 24-AUG-2021	RL Cmpl Date: 16-SEP-2021	DIST(Mile): 27670
-----------------------	-----------	-------------------------------	------------------------	---------------	---------------------	-------------------	-------------------------------	----------------------------------	--------------------------

Cust Comments: CUSTOMER STATES CHECK ENGINE LIGHT IS ON. PLEASE CHECK AND ADVISE

Tech Comments: Performed gasoline engine Diagnostics Run KOEO Check test P0451- EVAP- system leak test failed- Following pinpoint test HX to-HX20-Found fuel tank pressure sensor inoperate. performed diagnosis and found fuel pump losing power intermittently. tested fuel pump for short to ground and none found. tested fuel pump connecter for continuity, found power to fuel pump good. found fuel pump loosing power internally. Removed fuel tank and replaced Fuel Pump assembly. roadtest vehicle after repairs. all operations normal at this time.

Exhibit 3

JS - 6

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Jerry Zomorodian,

PLAINTIFF,

v.

BMW of North America, LLC, et al.,

DEFENDANTS.

CASE NUMBER

CV 17-5061-DMG (PLAx)

**JUDGMENT ON THE VERDICT
FOR THE PLAINTIFF(S)**

This action came on for jury trial, the Honorable Dolly M. Gee, District Judge, presiding, and the issues having been duly tried and the jury having duly rendered its verdict,

IT IS ORDERED AND ADJUDGED that the plaintiff Jerry Zomorodian recover of the defendant BMW of North America, LLC the sum of \$176,976.60, with interest thereon at the legal rate as provided by the law.

Clerk, U. S. District Court

Dated: December 18, 2018

By Kane Tien
Deputy Clerk

Exhibit 4

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
05/01/2017 at 10:18:00 AM
Clerk of the Superior Court
By Jenitta Mrisimo, Deputy Clerk

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO

JOHN ASPINALL,

Plaintiff,

vs.

KIA MOTORS AMERICA, INC., a California
corporation, and DOES 1 through 10, inclusive,

Defendants.

Case No.: 37-2015-00002577-CU-BC-CTL

Assigned to the Hon. Eddie C. Sturgeon
Department 67

[PROPOSED]
JUDGMENT ON JURY VERDICT

This action came for Trial on February 27, 2016, in Department 67 of the Superior Court of California, County of San Diego, Central Division Hall of Justice, located at 220 West Broadway San Diego, CA 92101, the Honorable Eddie C. Sturgeon presiding.

A jury of twelve (12) persons was regularly impaneled and sworn. Witnesses were sworn and testified. After hearing the evidence and arguments of counsel, the jury was duly instructed by the Court and the cause was submitted to the jury with directions to return a verdict. The jury deliberated and thereafter returned to the court its verdict, as follows, to wit:

JUDGMENT ON JURY VERDICT

1 We answer the questions submitted to us as follows:

2
3 **1. Did John Aspinall buy a 2012 KIA Forte distributed by KIA Motors America, Inc.?**

4
5 ☒ Yes ☐ No

6
7 If your answer to question 1 is yes, then answer question 2. If you answered no, stop here,
8 answer no further questions, and have the presiding juror sign and date this form.

9
10 **2. Did KIA Motors America, Inc. give John Aspinall a written warranty?**

11
12 ☒ Yes ☐ No

13
14 If your answer to question 2 is yes, then answer question 3. If you answered no, stop here,
15 answer no further questions, and have the presiding juror sign and date this form.

16
17 **3. Did the 2012 KIA Forte have a defect covered by the warranty that substantially**
18 **impaired the vehicle's use, value, or safety to a reasonable buyer in John Aspinall's**
19 **situation?**

20
21 ☒ Yes ☐ No

22
23 If your answer to question 3 is yes, then answer question 4. If you answered no, stop here,
24 answer no further questions, and have the presiding juror sign and date this form.

1 4. Did KIA Motors America, Inc. or its authorized repair facility fail to repair the 2012
2 KIA Forte to match the written warranty after a reasonable number of
3 opportunities to do so?

4
5 X Yes No

6
7 If your answer to question 4 is yes, then answer question 5. If you answered no, stop here,
8 answer no further questions, and have the presiding juror sign and date this form.

9
10 5. Did KIA Motors America, Inc. fail to promptly replace or repurchase the 2012 KIA
11 Forte?

12
13 X Yes No

14
15 If your answer to question 5 is yes, then answer question 6. If you answered no, stop here,
16 answer no further questions, and have the presiding juror sign and date this form.

17
18 6. What are John Aspinall's damages? Calculate as follows:

19 Add the following amounts:

20
21 a. The amount paid to date for the 2012 KIA Forte, including finance charges, sales
22 tax, use tax, license fees, registration fees, and other official fees:

23
24 \$ 25,687.78

25
26 b. Incidental and consequential damages:

27
28 \$ 1,342.00

3

JUDGMENT ON JURY VERDICT

1 c. Add the amount in (a) to the amount in (b):

2

3 SUBTOTAL: \$ 27,029.78

4 Answer question 7.

5

6 7. Calculate the value of the use of the vehicle before it was brought in for repair as
7 follows:

8

9 a. Cash Price of Vehicle \$ 25,687.78

10

11 b. What is the number of miles that the vehicle was driven between the time when
12 Plaintiff took possession of the vehicle and the time when the vehicle was delivered to
13 KIA or its authorized repair facility to fix the problem?

14

15 Answer: 10,991 miles

16

17 c. Divide the number of miles in step 7(b) by 120,000 and multiply that result by the
18 cash price of the vehicle in step 7(a). Insert result in VALUE OF USE below:

19

20 VALUE OF USE: \$ 2,353.00

21

22 Subtract the VALUE OF USE (Question 7(c)) from the SUBTOTAL (Question 6(c)) and
23 insert result in TOTAL DAMAGES below:

24

25 TOTAL DAMAGES: \$ 24,676.78

26

27 Answer question 8.

28

1 8. Did KIA Motors America, Inc. willfully fail to repurchase or replace the 2012 KIA
2 Forte?

3
4 X Yes No

5
6 If your answer to question 8 is yes, then answer question 9. If you answered no, stop here,
7 answer no further questions, and have the presiding juror sign and date this form.

8
9 9. What amount, if any, do you impose as a penalty? You may not exceed two times
10 the "TOTAL DAMAGES" that you entered in question 7.

11
12 PENALTY: \$ 49,353.56

13
14
15
16
17
18 Signed: /s/

19 Presiding Juror

20
21 Dated: March 8, 2017

22
23 After this verdict form has been signed, notify the court attendant that you are ready to present
24 your verdict in the courtroom.

1 NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED as follows:

2 1. Plaintiff John Aspinall shall recover from Defendant, Kia Motors America, Inc.
3 the amount of \$74,030.34 with interest thereon at the rate of ten percent per annum from the date
4 of entry of this judgment until paid.

5 2. Plaintiffs shall recover costs and expenses in the amount of \$ _____.

6 3. Plaintiffs shall recover attorneys' fees in the amount of \$ _____.

7 4. Plaintiff shall recover prejudgment interest in the amount of: \$ _____.

8 This Court shall decide all issues involving fees, costs and expenses, post-verdict and to
9 fill in the blanks, or order an amended judgment be prepared.

10

Eddie C. Sturgeon

11

12 Dated: _____

5/1/17

13

Superior Court Judge

14

Judge Eddie C Sturgeon

15

16 Prepared by:
17 LAW OFFICES OF MICHAEL H. ROSENSTEIN, LC
18 Michael H. Rosenstein (SBN 169091)
19 Brian T. Shippen-Murray (SBN 288188)
20 1801 Century Park East, Suite 2300
21 Los Angeles, California 90067
22 Telephone: (310) 286-0275
23 Facsimile: (310) 286-0274
24 Attorneys for Plaintiff,
25 JOHN ASPINALL
26
27
28

EXHIBIT 5

F I L E D
Clerk of the Superior Court

SEP 26 2017

By: R. SMITH, Deputy

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO**

JULIE HARRIS,

Plaintiff,

vs.

**HYUNDAI MOTOR AMERICA, a
California Corporation, and DOES 1
through 10, inclusive,**

Defendant.

Case No.: 37-2015-00019958-CU-BC-CTL
Unlimited Jurisdiction

*Assigned for All Purposes to the Honorable
Kevin A. Enright*

**AMENDED JUDGMENT ON
JURY VERDICT**

Trial Date: March 21, 2017
Time: 9:30 AM
Dept: C-74

[PROPOSED] AMENDED JUDGMENT ON JURY VERDICT

1 This action came for Trial on March 21, 2017 in Department C-74 of the Superior Court
2 of California, County of San Diego, Central Courthouse located at 330 West Broadway, San
3 Diego, California 92101, the Honorable Kevin A. Enright presiding. Plaintiff was represented at
4 trial by Bryan Altman, Esq. and Lauren Unga, Esq. Defendant was represented by Brian
5 Takahashi, Esq.

6 A jury of twelve (12) persons was regularly impaneled and sworn. Witnesses were sworn
7 and testified. After hearing the evidence and arguments of counsel, the jury was duly instructed
8 by the Court and the cause was submitted to the jury with directions to return a verdict. The jury
9 deliberated and thereafter returned to the Court its verdict, as follows, to wit:

10 We answer the questions submitted to us as follows:

11
12 1. Did Julie Harris purchase a motor vehicle distributed by Hyundai Motor America?
13

14 X Yes No

15 *If your answer to question 1 is yes, then answer question 2. If you answered no,*
16 *stop here, answer no further questions, and have the presiding juror sign and date*
17 *this form.*

18
19 2. Did Hyundai Motor America give Ms. Harris a written warranty?
20

21 X Yes No

22
23 *If your answer to question 2 is yes, then answer question 3. If you answered no,*
24 *stop here, answer no further questions, and have the presiding juror sign and date*
25 *this form.*

26 3. Did the vehicle have a defect or defects covered by the warranty that substantially impaired
27 the vehicle's use, value, or safety to a reasonable buyer in Ms. Harris' situation?
28

1 ☒ Yes ☐ No

2
3 *If your answer to question 3 is yes, then answer question 4. If you answered no,*
4 *stop here, answer no further questions, and have the presiding juror sign and date*
5 *this form.*

6 4. Did Hyundai Motor America or its authorized repair facility fail to repair the vehicle to match
7 the written warranty after a reasonable number of opportunities to do so?

8
9 ☒ Yes ☐ No

10
11 *If your answer to question 4 is yes, then answer question 5. If you answered no, stop*
12 *here, answer no further questions, and have the presiding juror sign and date this form.*

13 5. Did Hyundai Motor America fail to promptly replace or repurchase the vehicle?

14
15 ☒ Yes ☐ No

16
17 *If your answer to question 5 is yes, then answer question 6. If you answered no,*
18 *stop here, answer no further questions, and have the presiding juror sign and date*
19 *this form.*

20
21 6. What are Plaintiff's damages? Calculate as follows: Add the following amounts:

22
23 a. The amount paid for the vehicle to date: \$ 28,591.80
24 b. The amount owed to pay off the loan for the vehicle: \$ 4,506.00
25 c. Any other incidental and consequential damages: \$ 4,222.27

26 SUBTOTAL:

27 \$ 37,320.07
28

1 *Answer question 7.*

2
3 7. Calculate the value of the use of the vehicle before it was brought in for repair as follows:

4
5 a. The cash price of the vehicle: \$ 37,320.07

6 b. What is the number of miles that the vehicle was driven between the time when Ms.
7 Harris took possession of the vehicle and the time when she first delivered the vehicle
8 to Hyundai Motor America or its authorized repair facility to fix the problem?

9
10 0

11
12 c. Multiply the results in Step (a) by the number of miles the vehicle was driven
13 before it was brought in for repair in Step (b):

14 \$ N/A

15
16 d. Divide the dollar amount in Sept (c) by 120,000 and insert result in VALUE
17 OF USE below:

18 VALUE OF USE: \$ N/A

19
20 e. Subtract the VALUE OF USE from the SUBTOTAL above and insert results in
21 TOTAL DAMAGES below:

22 TOTAL DAMAGES: \$37,320.07

23 *Answer question 8.*

24
25 8. Did Hyundai Motor America willfully fail to repurchase or replace the 2012 Hyundai Santa
26 Fe?

27 X Yes No
28

1 *If your answer to question 8 is yes, then answer question 9. If you answered no,*
2 *stop here, answer no further questions, and have the presiding juror sign and date*
3 *this form.*

4 9. What amount, if any, do you impose as a penalty? (You may not exceed two
5 times the actual damages in 7 (e).

6 Answer: \$ 74,640.14

7
8 *Stop, date and sign the verdict form.*

9
10 Signed: /s/Corey Coble

11 Presiding Juror

12
13
14 Dated: April 4, 2017

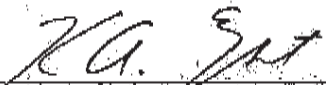
15
16 *After this verdict form has been signed, deliver this verdict form to the clerk.*
17
18
19
20
21
22
23
24
25
26
27
28

1
2 NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED as follows:

- 3 1. Plaintiff Julie Harris shall recover from Defendant, Hyundai Motor America, the
4 amount of \$111,960.21, with interest thereon at the rate of ten percent per annum
5 from the date of entry of this judgment until paid;
6 2. Plaintiff shall recover costs in the amount of: \$31,853.65.
7 3. The Court Denied prejudgment interest.
8 4. Plaintiff shall recover attorneys' fees in the amount of \$199,248.08.

9 This Court having decided all issues involving fees, prejudgment interest, and costs, post-
10 verdict, this amended judgment is ordered entered.

11
12
13 Dated: 9-26-17

14 
15 Honorable Kevin A. Enright
16 San Diego Superior Court Judge
17

18 Prepared by:
19 **KNIGHT LAW GROUP, LLP**
20 Steve Mikhov (SBN 224676)
21 1801 Century Park East, Suite 2300
22 Los Angeles, CA 90067
23 Telephone: (310) 552-2250
24 Fax: (310) 552-7973
25
26
27
28

EXHIBIT 6

ORIGINAL

FILED
Superior Court of California
County of Los Angeles

JUL 10 2018

Sherrill Carter, Executive Officer/Clerk
By R. Mason Deputy

RECEIVED
JUN 07 2018
FILING WINDOW

RECEIVED
JUN 07 2018
FILING WINDOW

KNIGHT LAW GROUP, LLP

Lauren A. Unga (SBN 273374)
1801 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 552-2250
Facsimile: (310) 552-7973
Email: lauren@knightlaw.com

THE ALTMAN LAW GROUP

Bryan Altman (SBN 122976)
6300 Wilshire Blvd. Suite 980
Los Angeles, CA 90048
Telephone: (323) 653-5581
Facsimile: (310) 653-5542
Email: bryan@altmanlawgroup.net

Attorneys for Plaintiff,
WANDA JEAN JOHNSON

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

WANDA JEAN JOHNSON,

Plaintiff,

vs.

HYUNDAI MOTOR AMERICA, a
California Corporation; and DOES 1
through 10 inclusive,

Defendant.

Case No.: BC616616
Unlimited Jurisdiction

Judge: Hon. Howard Halm
Dept.: 53

~~PROPOSED~~ JUDGMENT ON JURY
VERDICT

~~PROPOSED~~ JUDGMENT ON JURY VERDICT

BY FAX

Costs and attorney fees Affixed to
segment 6-12-19. Attest: [Signature] Deputy Clerk of the
Superior Court
06/15/2018

1 This action came for Trial on May 22, 2018 in Department 53 of the Superior Court of
2 California, County of Los Angeles, Central District Courthouse located at 111 North Hill Street,
3 Los Angeles, California 90012, the Honorable Howard Halm presiding. Plaintiff was
4 represented at trial by Bryan Altman and Lauren A. Ungs. Defendant was represented by Brian
5 Takahashi and Jimmy Park.

6 A jury of twelve (12) persons was regularly empaneled and sworn. Witnesses were
7 sworn and testified. After hearing the evidence and arguments of counsel, the jury was duly
8 instructed by the Court and the cause was submitted to the jury with directions to return a
9 verdict. The jury deliberated and thereafter returned to the Court its verdict, as follows, to wit:

10 We answer the questions submitted to us as follows:

11
12 **BREACH OF EXPRESS WARRANTY**

13 We answer the questions submitted to us as follows:

14 1. Did Wanda Johnson buy a 2012 Hyundai Veracruz distributed by Hyundai Motor
15 America?

16 X Yes No

17 *If your answer to question 1 is yes, then answer question 2. If you answered no, stop here,
18 answer no further questions, and have the presiding juror sign and date this form.*

19 2. Did Hyundai Motor America give Wanda Johnson a written warranty?

20 X Yes No

21 *If your answer to question 2 is yes, then answer question 3. If you answered no, stop here,
22 answer no further questions, and have the presiding juror sign and date this form.*

23 3. Did the vehicle have a defect covered by the warranty that substantially impaired the
24 vehicle's use, value, or safety to a reasonable buyer in Wanda Johnson's situation?

25 X Yes No

26 *If your answer to question 3 is yes, then answer question 4. If you answered no, stop here,
27 answer no further questions, and have the presiding juror sign and date this form.*

28 4. Did Hyundai Motor America or its authorized repair facility fail to repair the vehicle to
match the written warranty after a reasonable number of opportunities to do so?

1 X Yes _____ No

2 If your answer to question 4 is yes, then answer question 5. If you answered no, stop here,
3 answer no further questions, and have the presiding juror sign and date this form.

4 5. Did Hyundai Motor America fail to promptly replace or repurchase the vehicle?

5 X Yes _____ No

6 If your answer to question 5 is yes, then answer question 6. If you answered no, stop here,
7 answer no further questions, and have the presiding juror sign and date this form.

8 6. What are Wanda Johnson's damages? Calculate as follows:

9 Add the following amounts:

10 a. The purchase price of the vehicle, manufacturer installed options, finance charges,
11 sales tax, license fees, registration fees, and other official fees:

12 \$ 40,860.83

13 b. Incidental and Consequential Damages:

14 \$ 0

15 c. SUBTOTAL/TOTAL DAMAGES (add lines a and b):

16 \$ 40,860.83

17 Calculate the value of the use of the vehicle before it was [brought in/submitted] for repair as
18 follows:

19 1. Line 1(A) of the sales contract: \$ 33,688.90

20 2. The number of miles the vehicle
21 was driven before it was
22 brought in for repair:

23 7,827 miles

24 3. Multiply the result in step 1 by
25 the number of miles in step 2
26 and divide the result by 120,000
27 and insert result in VALUE OF
28 USE below:

VALUE OF USE: \$ 2,171.93

1 Subtract the VALUE OF USE from the SUBTOTAL above and insert result in TOTAL
2 DAMAGES below:

3 TOTAL DAMAGES: \$ 38,688.90

4 Answer question 7:

5 7. Did Hyundai Motor America willfully fail to repurchase or replace the 2012 Hyundai
6 Veracruz?

7 X Yes No

8 If your answer to question 7 is yes, then answer question 8. If you answered no, stop here,
9 answer no further questions, and have the presiding juror sign and date this form.

10 8. What amount, if any, do you impose as a penalty? (You may not exceed two times the
11 "TOTAL DAMAGES" that you entered in question 6.)

12 PENALTY: \$ 77,377.80

13 Signed: Christopher Hughes, Juror #10
14 Presiding Juror

15 Dated: 5/31/18

16 After this verdict form has been signed, notify the bailiff that you are ready to present your
17 verdict in the courtroom.

06/13/2019

08/12/2022/2201183

NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND DECREED as follows:

1. Plaintiff Wanda Jean Johnson shall recover from Defendant, Hyundai Motor America, the amount of \$116,066.70 with interest thereon at the rate of ten percent per annum from the date of entry of this judgment until paid.


2. Plaintiff shall recover costs and expenses in the amount of \$85,054.46

3. Plaintiff shall recover attorneys' fees in the amount of \$187,065.94

~~4. Plaintiff shall recover prejudgment interest in the amount of \$~~

This Court shall decide all issues involving fees, costs, expenses and prejudgment by post-verdict motion(s) and will fill in the blanks, or order an amended judgment be prepared.

Dated: JUL 10 2018


Superior Court Judge
JUDGE HOWARD L. HALM

Prepared by:
KNIGHT LAW GROUP, LLP
Lauren A. Unga (SBN 273374)
1801 Century Park East, Suite 2300
Los Angeles, CA 90067
Telephone: (310) 552-2250
Facsimile: (310) 552-7973

Attorneys for Plaintiff
WANDA JEAN JOHNSON

06/13/2019

06/28/2018

FEDERAL COURT PROOF OF SERVICE

Clark v. Ford Motor Company
Case No. 22STCV11319

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

At the time of service, I was over 18 years of age and not a party to the action. My business address is 333 Bush Street, Suite 1100, San Francisco, CA 94104-2872. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On June 16, 2022, I served the following document(s):

**DECLARATION OF TAYLOR F. SULLIVAN IN SUPPORT OF
DEFENDANT FORD MOTOR COMPANY'S OPPOSITION TO
PLAINTIFFS' MOTION FOR REMAND TO SUPERIOR COURT OF
CALIFORNIA**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Armando Lopez
Knight Law Group, LLP
10250 Constellation Blvd., Suite 2500
Los Angeles, CA 90067
Attorney for Plaintiff

Telephone: (310) 552-2250
Fax: (310) 552-7973
Email: emailservice@knightlaw.com
armandol@knightlaw.com

The documents were served by the following means:

☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on June 16, 2022, at San Francisco, California.



Charmaine Villavert